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15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
16 *Ultimate Fighting Championship and UFC*

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19
20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
25 Championship and UFC,

26 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF ZUFFA,
LLC'S MOTION TO SEAL PORTIONS
OF PLAINTIFFS' REPLY BRIEF**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am an attorney admitted to practice before the courts in the states of New York
3 and the District of Columbia and am admitted Pro Hac Vice to practice before this Court. I am
4 Counsel in the law firm Boies, Schiller & Flexner LLP, and represent Defendant Zuffa, LLC
5 (“Zuffa”) in this case.

6 2. I make this declaration in support of Zuffa’s Motion to Seal Portions of Plaintiffs’
7 Reply Brief in Support of Plaintiffs’ Motion to Challenge Work Product Designation and Related
8 Exhibits. Based on my review of the files and records in this case, I have firsthand knowledge of
9 the contents of this declaration and could testify thereto.

10 3. Zuffa seeks to file under seal one exhibit identified as Exhibit 4 to the Declaration
11 of Kevin Rayhill in Support of Plaintiffs’ Reply as well as portions of Plaintiffs’ Reply Brief.
12 This declaration is submitted to provide the factual and legal support for the filing of this material
13 under seal.

14 4. Federal Rule of Civil Procedure 26(c) provides that the Court may “issue an order
15 to protect a party or person from annoyance, embarrassment, oppression or undue burden or
16 expense” by “requiring that a trade secret or other confidential research, development, or
17 commercial information not be revealed or be revealed only in a specific way.” Further, “[c]ourts
18 generally accept attorney-client privilege and the work-product doctrine as a ‘compelling reason’
19 justifying a motion to seal.” *Hanson v. Wells Fargo Home Mortg., Inc.*, No. C13-0939JLR, 2013
20 WL 5674997, at *3 (W.D. Wash. Oct. 17, 2013) (citation omitted); *see also Asdale v. Int’l Game*
21 *Tech.*, No. 3:04-cv-703-RAM, 2010 WL 2161930, at *5 (D. Nev. May 28, 2010) (accepting
22 attorney-client privilege and the work-product doctrine as both good cause and a compelling
23 reason to seal nondispositive and dispositive motions respectively); *JL Beverage Co., LLC v.*
24 *Beam, Inc.*, No. 2:11-cv-00417-MMD-CWH, 2014 WL 5017862, at *3 (D. Nev. Oct. 7, 2014)
25 (sealing portions of motion and certain exhibits “to protect against disclosure of attorney-client
26 privilege and attorney work-product information”).
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